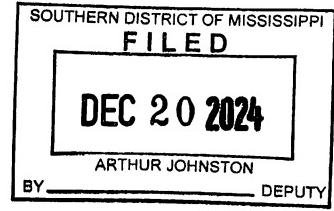


UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF MISSISSIPPI



QJR, LLC,

Plaintiff

Versus

CASE NO. 1:24-cv-383 TBM-RPM

SECURIX, LLC, and  
JONATHAN MILLER, INDIVIDUALLY  
AND AS CHAIRMAN OF SECURIX LLC,

Defendants

**MOTION TO FILE EXHIBIT A TO NOTICE OF REMOVAL  
UNDER RESTRICTION**

NOW INTO COURT through undersigned counsel come defendants Securix, LLC and Jonathan Miller individually and in his capacity as chairman of Securix, LLC, and hereby move and represent as follows:

(1)

On or about September 20, 2024, QJR, LLC filed a petition in the Chancery Court of Jackson County, Mississippi bearing docket number 30CH1:24-cv-01774-DNH.

(2)

Defendants are removing this case to federal court. Pursuant to 28 USC 1446(A), defendants have attached a copy of the petition to their notice of removal as Exhibit A.

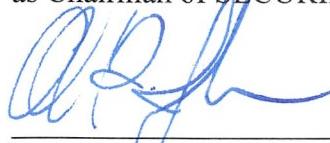
(3)

The state court has entered an *ex parte* order sealing the entire state court record, and in order to avoid violation of the order of the state court, your defendants respectfully ask this Honorable Court to order that Exhibit A to the notice of removal (the state court petition) be filed under restriction so that only this Honorable Court and parties to the case can view this Exhibit.

WHEREFORE defendants SECURIX, LLC and JONATHAN MILLER,  
INDIVIDUALLY AND AS CHAIRMAN OF SECURIX LLC respectfully ask that this  
Honorable Court order that Exhibit A appended to the Notice of Removal (the state court  
petition) be filed under restriction so that it can be viewed only by this Honorable Court and by  
the parties to this litigation.

Respectfully submitted, this the 20 day of December, 2024.

SECURIX, LLC and  
JONATHAN MILLER, individually and  
as Chairman of SECURIX, LLC



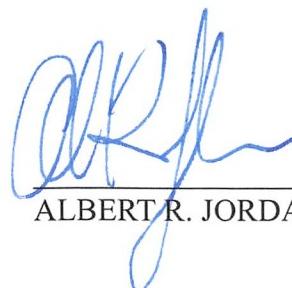
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Gulfport, MS 39501  
228-575-4005 - Telephone  
228-575-4006 – Facsimile  
EMAIL: Al@HealyJordanLaw.com

**CERTIFICATE OF SERVICE**

I do certify that I have this date, December 20, 2024, mailed through the United States Postal Service, postage prepaid, a true and correct copy of the above and forgoing to the following:

Jacklyn Wrigley  
Erich N. Nichols  
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